

*100% Air Cargo Screening:
Can We Secure America's Skies?*



**Statement of James C. May, President and CEO
Air Transport Association of America, Inc.
before the
Subcommittee on Transportation Security
and Infrastructure Protection
of the
House Committee on Homeland Security**

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AIR TRANSPORT ASSOCIATION

We appreciate the opportunity to inform you of the airline industry's progress in achieving 100 percent screening of cargo transported on passenger-carrying aircraft by August 2010. The Air Transport Association members are committed to do their part in meeting that key requirement of the *9/11 Commission Recommendations Act*.

I am pleased to report that the airline industry has fulfilled the interim requirement that 50 percent of such cargo be screened by February 2009. This impressive achievement reflects hard work; this was not an easy task. That experience has taught us an important lesson: Achieving the 100 percent level will be difficult and will require the continued close collaboration of the airlines, the Transportation Security Administration, freight forwarders and shippers.

The biggest challenge in meeting the August 2010 deadline is the lack of TSA-certified screening technology to inspect large air cargo pallets. Most pieces of cargo transported on wide-body aircraft are consolidated into large shipments and 75 percent of cargo is transported on wide-body aircraft. That fact gives you an idea of the magnitude of the challenge that we face.

Shippers and freight forwarders typically create these pallet-size shipments before they are tendered to an airline. The dilemma is that screening is required at the piece level but existing technology cannot screen large consolidated shipments. The nature of our business and available screening equipment are, at least for the time being, badly mismatched.

Breaking down consolidated shipments at an airport cargo facility is not practical. Shipment size, time constraints and facility limitations are the main difficulties. A pallet can have as many as 200 pieces on it. Dismantling it and screening each piece is labor intensive and time consuming. To place this in some perspective, it can take 75 minutes for two employees to break down and reassemble a pallet. In addition, airport cargo facilities were never designed to be high-volume disassembly and reassembly locations. They are not big enough to perform that role, especially at peak times.

We therefore need to be very careful that airport cargo facilities do not become choke points. Screening each piece from a consolidated shipment at those facilities would undercut what air cargo service is supposed to be all about: speedy movement of freight. Complicating this situation is the fact that shippers of high-value items, such as electronics and pharmaceuticals, for their own security reasons do not want their consolidated shipments to be broken down.

Canine screening is the only easily applied screening method that does not require pallets to be disassembled. Because of that, for the foreseeable future they will be the most effective and least costly screening method for all types and configurations of cargo. Unfortunately, there are not enough canines deployed at airports to screen such shipments on every wide-body passenger flight. This means that alternative screening measures that are both effective and efficient need to be implemented.

The Certified Cargo Screening Program (CCSP) is such a measure. This program enables a high percentage of air cargo screening to be performed "upstream" in the supply chain. Upstream security measures – avoiding the airport cargo facility – are essential in the current environment. Under CCSP, screening occurs at the shippers' or freight forwarders' premises, where the cargo can be screened at the piece level as TSA requires. These are known as Certified Cargo Screening Facilities. This procedure is a very practical but expensive solution. Freight forwarders and other supply-chain participants must purchase equipment and train employees to carry out the program. This has imposed an additional financial burden on the forwarder industry. Nevertheless, if applied widely, it is a workable solution.

The Department of Homeland Security is to be complimented for its high-tempo implementation of the CCSP. Its performance has been admirable. Going forward, it cannot falter in maintaining that tempo. The CCSP is an indispensable tool in meeting the August 2010 deadline. If enough shippers and forwarders are not certified, attaining that deadline will be at risk.

While we very much appreciate the Department's efforts, it needs to act immediately in three areas to assure timely achievement of the 100 percent screening mandate:

1. Enlarge rapidly the number of Certified Cargo Screening Facilities at large shippers, manufacturers, freight forwarders and other TSA-certified Indirect Air Carriers.
2. Expand as swiftly as possible the use of TSA-certified explosive-detection canines to screen large air cargo consolidations, and direct additional funding to the TSA proprietary canine cargo screening program.
3. Provide for additional federal funding or incentives (e.g., tax relief for privately purchased screening equipment) for all TSA-certified indirect air carriers and other qualified CCSP participants. This will enable small and medium-size companies to participate in the CCSP and enable large companies to continue to invest in screening equipment.

We are committed to achieving the 100 percent screening mandate. The three initiatives described above will enable that statutory mandate to be realized on time and in a way that will minimize adverse affects on the shipping public. We ask that you support us in this endeavor.